

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

IN RE: WILBUR L. BURTON AND)Bank. No. 18-24697 CMB
SHARON C. BURTON,)
Debtors.)Chapter 13
)
WILBUR L. BURTON AND)Docket No. 99
SHARON C. BURTON,)Related to Docket No. 95, 96
Movants,)
vs.)Hearing Date & Time: 10/28/2020
Respondent.) at 10:30 a.m.
)
ATLANTICA, LLC c/o)
LAND HOME FINANCIAL)
SERVICES,)
)

MOTION TO COMPEL AND ISSUE SANCTIONS

AND NOW, comes the Debtors, Wilbur L. Burton and Sharon C. Burton, by and through their attorney, Rodney D. Shepherd, Esquire, who respectfully represents the following:

1. On or about July 3, 2020, the Debtors filed a Motion for Loss Mitigation.
2. An Order was entered on July 21, 2020 directing the parties to participate in Loss Mitigation.
3. The Debtors were required within 7 days of the Order to upload a LMP Package through the Portal. This was done on July 27, 2020.
4. Land Home Financial Services were required within 14 days of the Debtors' submission of the LMP Package to acknowledge receipt and designate a contact person. That would have been August 10, 2020. To date no acknowledgment or any type of communication has been received from Land Home Financial Services. No response at all.

WHEREFORE, Debtors pray that this Honorable Court compel Atlantica, LLC c/o Land Home Financial Services to immediately acknowledge receipt of the Debtors' submission of the LMP Package and award attorney fees in the amount of \$1,000.00.

Respectfully submitted,

/s/ Rodney D. Shepherd
Rodney D. Shepherd, Esquire
Attorney for the Debtors

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